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November 15, 2018

***By ECF and Email:***

***chambers of rg@njb.uscourts.gov***

Honorable Rosemary Gambardella  
United States Bankruptcy Court  
50 Walnut Street  
Newark, New Jersey 07102

**Re: In re: Dianna Guadagnino  
Case No.: 17-12951  
Confirmation Hearing Upon the Debtor's Plan of Reorganization  
Hearing Date: November 28, 2018 at 11:00 a.m.**

Hon. Judge Gambardella:

Please be advised that this firm represents Dianna Guadagnino, the debtor in the above captioned matter. I am writing in response to the application of Liberty Park, LLC ("Liberty Park"), dated November 12, 2018, ("Liberty Application") seeking the entry of an Order conditionally approving its disclosure statement and establishing a schedule for proceeding with the confirmation of Liberty Park's Plan of Reorganization ("Liberty Plan").

It is important to note that Liberty Park is not a creditor in this matter. Moreover, Liberty Park was not a party in interest until September 7, 2018 when; (i) Liquidity Solutions, Inc. purchased the claim of Connell Foley in the amount of \$11,259.80; and thereafter (ii) Liberty Park immediately purchased such claim from Liquidity Solutions. Thus, Liberty Park was not a party in interest for the first 20 months of the Debtor's Chapter 11 case.

Upon information and belief, Liberty Park is a real estate developer seeking to misuse the Chapter 11 process to identify and acquire real estate for development purposes. The Debtor respectfully submits that such conduct constitutes bad faith, and is prohibited by Section 1129(a)(3) of the Bankruptcy Code.

On October 16, 2018, Liberty Park filed the Liberty Plan. Subsequently, it delayed taking further action pursuing the Liberty Plan for approximately 30 days, until it filed the Liberty Application.

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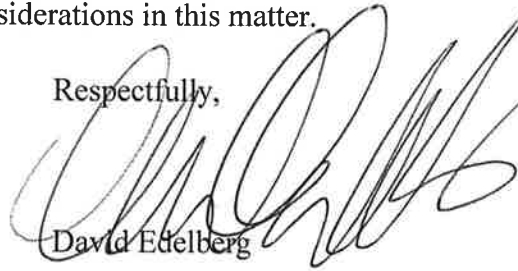
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As the Court may recall, Ms. Guadagnino filed her plan on July 31, 2018, and has been diligently pursuing confirmation of same. Ms. Guadagnino expects to be fully prepared to proceed with confirmation of her plan on the scheduled November 28, 2018 hearing date.

Based upon the foregoing, Ms. Guadagnino respectfully requests that the Court defer taking further action upon the Liberty Application until Ms. Guadagnino has had an opportunity to confirm the Debtor's Plan.

Thank you for Your Honor's considerations in this matter.

Respectfully,

A handwritten signature in black ink, appearing to read 'David Edelberg', is written over the word 'Respectfully,'.

David Edelberg

DE/hq

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